

EXHIBIT K

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND**

-----X
**YLL IRREVOCABLE TRUST and
KOCHAV S.A.R.L.,**

Plaintiffs,

Index No. 031899/2012

-against-

**SUPPLEMENTAL
AFFIRMATION**

**RABBI SHLOMO ZALMAN KAUFMAN,
RABBI ALEXANDER GRAUSZ,
RABBI MOISHE BERGMAN,
KOLEL BETH YECHIEL MECHIL OF
TARTIKOV, INC., and
WILMINGTON SAVINGS FUND SOCIETY, FSB,**

Defendants.

-----X
STATE OF NEW YORK : COUNTY OF NEW YORK

MARK W. GEISLER, an attorney duly admitted to practice law before the Courts of the State of New York, affirms under penalty of perjury as follows:

1. I am associated with Hoffinger Stern & Ross, LLP, attorneys for plaintiffs YLL Irrevocable Trust ("YLL") and Kochav S.A.R.L. ("Kochav" and together with YLL sometimes referred to as the "Plaintiffs"). I submit this Supplemental Affirmation in support of Plaintiffs' request for an emergency TRO, enjoining the Defendants from transferring, conveying, assigning, encumbering the Policies at issue, and for a preliminary injunction providing similar injunctive relief as well as other relief (motion no. 2). The Court issued a TRO with respect to motion no. 1, which seeks, *inter alia*, to stay enforcement of a certain First Preliminary Decision, Ruling and Award of the Rabbinical Court. Motion no. 1 is supported, in part, by an affirmation/affidavit from David Paneth.

2. Our office received this morning another affirmation/affidavit from David Paneth, of April 17, 2012, which is annexed hereto as Exhibit A. We respectfully submit this affidavit in further support of motion no. 2 (it also relates to motion no. 1).

3. In view of the content of the Paneth affidavit, we are submitting it ex parte at this stage, although we are electronically filing it. It is submitted the Paneth affidavit further demonstrates the need for the requested "freeze" on the Policies. The Paneth affidavit would indicate a lawless approach, one which needs to be stopped in its tracks.

WHEREFORE, it is respectfully requested that the relief sought herein and in the Order to Show Cause be granted in its entirety.

Dated: April 17, 2012
New York, New York



MARK W. GEISLER

FILED: ROCKLAND COUNTY CLERK 04/17/2012

INDEX NO. 031899/2012

NYSCEF DOC. NO. 12-1

RECEIVED NYSCEF: 04/17/2012

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

-----X
YLL IRREVOCABLE TRUST and
KOCHAV S.A.R.L.,

Plaintiffs,

Index No.

-against-

AFFIDAVIT

RABBI SHLOMO ZALMAN KAUFMAN
RABBI ALEXANDER GRAUSZ,
RABBI MOSHE BERGMAN
KOLEL BETH YECHIEL MECHIL OF
TARTIKOV, INC., and
WILMINGTON SAVINGS FUND SOCIETY, FSB

Defendants,
-----X

David Paneth being duly affirmed hereby deposes and says under penalties of perjury as follows;

1. I reside at 17 Dorset Monsey, New York.
2. On April 16th 2012, as I was leaving my house, I was approached by two unknown individuals, one of them was pointing to a weapon on his waist.
3. I was then instructed to settle with Rabbi Shlomo Zalman Kaufman while threatening to kill me if I will not obey, they further warned me not to talk to anyone about this, or else I will be killed.
4. I shortly thereafter contacted Rabbi Kaufman, while being under the impression that this had to do with a custody dispute in the community that I was involved with Rabbi Kaufman.
5. Rabbi Kaufman then said that it had nothing to do with "the custody case" but that he wants me to immediately retract my affidavit in the instant case that I signed on April 12th.
6. Rabbi Kaufman then put me on the phone with an unnamed attorney who instructed me to follow all instructions when I will be called back soon that day.
7. Rabbi Kaufman thereafter instructed me to call Mr. Zishe Gelb.
8. I then contacted Mr. Gelb on the same day, Mr. Gelb was furious that I had mentioned him in my affidavit of April 12th, Mr. Gelb then instructed me to follow all orders to retract my affidavit.

9. Thereafter, Mr. Gelb had several attorneys contact me, I don't know them, and they instructed me and insisted that I retract my April 12th affidavit, to which I agreed while fearing for my life.

10. Around 9:30 or 10 pm that same evening Mr. Gelb came to me and made me sign and notarize papers which stated that I retract my previous affidavit of April 12th, and that no such conversation between Rabbi Kaufman and himself as was described in my prior affidavit ever took place, Mr. Gelb had also flashed a badge before me.

10. Since April 12th I had received numerous harassing and intimidating phone calls regarding my affidavit, I was also approached by someone while flashing a badge impersonating officials, all this caused me great distress.

11. Yesterday's death threat's caused me immediate severe shock and trauma, I became oblivious to everything as I was scared to death, and I simply followed instructions.

12. This lasted till around 11 pm when I was finally able to personally reach Rabbi Chaim Rotenberg of Forshay, in Monsey, Rabbi Rotenberg was stunned and surprised as to what transpired, he helped me calm down, and urged me to immediately contact the Police.

13. I then called the Ramapo police; I waited over three hours for the police to arrive at Rabbi Rotenberg's house, when the police finally came, they advised me to go to the Spring Valley Police.

14. I immediately reported to the Spring Valley Police, and seeking protection.

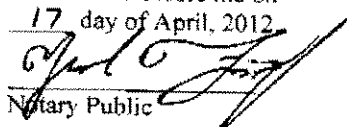
15. I am still under trauma and shock from all this unfolding of events, I realize that I was trapped and became a victim in order to fraudulently being tricked into retracting my April 12th affidavit to shut me down from being a witness, I am asking the Hon. court for protection.

Dated; Monsey, New York

April 17th, 2012


DAVID PANETH

Affirmed to before me on
17 day of April, 2012


Notary Public

YOEL FALKOWITZ
Notary Public State of New York
Rockland County
No. 01FA6245997
Term expires 8-8 20 15

